



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Steven Musher
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: February 7, 2008

SUBJECT: APA Quarterly Report for FY 2008,
First Quarter Ending 12/31/07

The following are the APA Program's results for the first quarter of FY 2008 ("Q1").

APAs Completed

The APA Program completed 30 APA matters in Q1, consisting of 9 unilateral APAs, 19 bilateral APAs, and 1 multilateral APA (which resolved 2 matters).

Negotiating-Position Papers

The APA Program completed 16 bilateral negotiating position papers in Q1.

Annual Reports

The APA Program completed its review of and closed 146 annual reports in Q1.

New Matters

The APA Program received 27 new APA matters in Q1, consisting of 19 bilateral matters and 8 unilateral APA matters. There was 1 withdrawal.

APA Inventory

The APA Program has an ending inventory of 249 open matters.¹ This consists of 209 bilateral and 40 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of December 31, 2007. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q1 inventory of 251 matters, plus 27 receipts and 2 other matters (reflecting an inventory adjustment), less 30 closures and 1 withdrawal ($251 + 27 + 2 - 30 - 1 = 249$).

2. The 249 open matters include 29 pending dollar filings (16 bilateral and 13 unilateral). Thus

- The APA Program has an inventory of 220 active cases, i.e., 249 open matters less 29 pending dollar filings.
- The 220 active cases consist of 193 bilateral cases (209 total bilateral matters less 16 pending bilateral dollar filings) and 27 unilateral cases (40 total unilateral matters less 13 pending unilateral dollar filings).
- The APA Program has forwarded 112 of the 193 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 108 cases, consisting of 81 bilateral (193 active bilateral cases less 112 forwarded to Competent Authority) and 27 active unilateral cases.